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September 26, 2019

U.S. Forest Service
Sequoia and Sierra National Forests
Planning Team Lead
1323 Club Drive
Vallejo, CA 94592

RE: Sequoia and Sierra National Forests Draft Revised Forest Plan and Draft Environmental Impact Statement

Dear U.S. Forest Service Officials,

The American Mountain Guides Association respectfully submits these comments on the Sequoia and Sierra National Forests Draft Revised Forest Plan and Draft Environmental Impact Statement.

The American Mountain Guides Association (AMGA) is a 501(c)(3) educational non-profit organization that provides training and certification for climbing instructors, mountain guides, and ski guides throughout the United States. Founded in 1979, the AMGA has trained over 13,000 climbing and skiing guides who provide outdoor experiences for the general public that emphasize safety, stewardship, and education. As the American representative to the International Federation of Mountain Guide Associations (IFMGA), the AMGA institutes international standards for the mountain guiding profession in the United States and serves as an educational body for land managers, guide services, outdoor clubs, and other recreation stakeholders. The advocacy arm of the AMGA supports sustainable use of public lands, facilitates stewardship projects, and works in cooperation with guides and land managers to promote best practices and preserve access to areas utilized by the guided public.

The Value of Recreation Special Uses

Recreation special uses such as outfitting and guiding provide substantial benefits for the public, the National Forest, and local communities. In an increasingly urban society, outfitters and guides connect people to the outdoors and foster an appreciation for public lands. They provide valuable interpretation of natural and cultural resources, they promote an ethic of conservation and stewardship, and they help to foster the next generation of public lands advocates. Outfitters and guides also support local communities by contributing to the vibrant and growing outdoor recreation economy. To ensure outfitting and guiding services on the Sequoia and Sierra National Forests continue to provide benefits for the public, the Forests, and local communities, we offer the following comments on the Draft Revised Forest Plan for the Sequoia and Sierra National Forests.

Special Use Permit Authorizations for Outfitting and Guiding

We support the preferred alternative, Alternative B, for the authorization of outfitting and guiding special uses on the Sequoia and Sierra National Forests with two modifications to the Sierra National Forest Plan as noted below.

The Draft Revised Plan for the Sierra National Forest, Appendix B, Special Uses, Pages 139-140, provides a bulleted list of proposed and possible actions related to special uses on the forest. We recommend changes to two of the proposed and possible actions that pertain to outfitting and guiding.

Bullet #1 states:

Monitor permits for existing special use activities on the national forest.

It is unclear if the language “monitor permits for existing special use activities” would allow for new outfitting and guiding activities in areas where capacity for those activities exists. We recommend the language be clarified to ensure new and existing outfitting and guiding activities can be authorized on the Sierra National Forest provided those uses are consistent with the desired conditions in each area.

Bullet #4 states:

Complete needs assessments for outfitter and guiding permits in both wilderness and non-wilderness areas.

The requirement to complete needs assessments for outfitter and guide permits should be limited to outfitting and guiding activities in wilderness as required by the Wilderness Act (16 USC 1133(d)(5)). Needs assessments consume a great deal of agency time and resources, and they often significantly delay the issuance of outfitting and guiding permits when conducted in areas outside of wilderness. We recommend the plan language maintain consistency with statutory requirements and only require the completion of needs assessments in designated wilderness.

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Thank you for the opportunity to share our perspective on the Sequoia and Sierra Draft Revised Forest Plans. With the changes to the Sierra National Forest Plan noted herein, we support the preferred alternative of the Draft Revised Forest Plan for Sequoia and Sierra National Forests and we look forward to working with the agency to promote the appropriate use of the National Forest System while protecting world class recreation and natural resources at the same time.

Sincerely,



Matt Wade
Advocacy & Policy Director
American Mountain Guides Association